

FILED
RICHARD W HAGEL
CLERK OF COURT

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON

2022 JUL 12 PM 3:20

USA JURY
SOUTHERN DIST. OHIO
WESTERN DIV DAYTON

UNITED STATES OF AMERICA, : Case No.. 8 22 cr 0081
: :
Plaintiff, : I N D I C T M E N T
: :
v. : 18 U.S.C. § 1952(a)(1)
: :
JOSEPH STEPHEN IAVECCHIO, : THOMAS M. ROSE
: :
Defendant. : :

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1952(a)(1)]

On or about November 8, 2021, in the Southern District of Ohio, defendant **JOSEPH STEPHEN IAVECCHIO** traveled in interstate commerce and used any facility in interstate commerce with the intent to distribute the proceeds of any unlawful activity - namely, a business enterprise involving controlled substances.

In violation of Title 18, United States Code, Section 1952(a)(1).

FORFEITURE ALLEGATION

Upon conviction of the offense set forth in Count One of this Information, defendant **JOSEPH STEPHEN IAVECCHIO** shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violation, including but not limited to \$454,380.00 in U.S. Currency.

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek

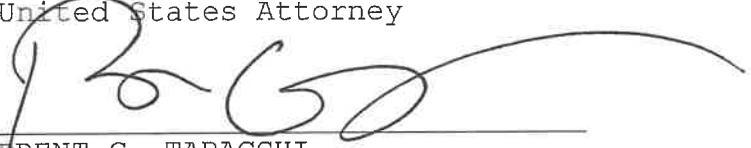
forfeiture of any other property of the defendant, up to the value of the property described above.

A TRUE BILL



FOREPERSON

KENNETH L. PARKER
United States Attorney



BRENT G. TABACCHI
Assistant United States Attorney